

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major–Revised Permit No. F-03-002 R2

Hillshire Farm and Kahn's
401 Bob Huber Drive
Alexandria, Kentucky 41001

September 18, 2003

Ralph E. Gosney, Reviewer

Plant I.D. #: 21-037-00074

Application Log #: 55893

SOURCE DESCRIPTION:

Revision 1 of the operating/conditional major permit (F-03-002 Revision 1) was completed on June 25, 2003 and issued to Hillshire Farm and Kahn's. The existing permit is for the operation of heat exchangers and ovens for the packaging and production of meats. The applicant is permitted to operate four (4) indirect heat exchangers. These heat exchangers consist of three 8.37 mmBtu/hr natural gas-fired units and one 20 mmBtu/hr natural gas fired unit. The applicant is also permitted to operate (2) continuous and (12) batch meat-smoking ovens. The continuous ovens have a 1.65 mmBtu/hr heating rate, while the batch ovens have seven 2.75 mmBtu/hr and five 3.85 mmBtu/hr heating rates.

An application was received on July 22, 2003 for the minor revision of Permit F-03-002R1. The minor revision includes the insignificant addition of a liquid smoke application process prior to the continuous oven (emission unit 004); and the federally enforceable reduction of the sawdust usage limits to the continuous and batch ovens.

EMISSION AND OPERATING CAPS DESCRIPTION:

The source has agreed to take federally enforceable limitations on the ovens to preclude implementation of 401 KAR 52:020. The total amount of wood or sawdust for emission units 04 and 12 shall not exceed 550 tons/yr. The total amount of wood or sawdust for emission units 05-11, 13-16, and 18 shall not exceed 1600 tons/yr. Additional operating limitations are set out in Section D of the permit.

OPERATIONAL FLEXIBILITY: None

CREDIBLE EVIDENCE:

This permit contains provisions that require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec.

61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.